

1 MICHAEL C. ORMSBY  
2 United States Attorney  
3 Eastern District of Washington  
4 Aine Ahmed  
5 Assistant United States Attorney  
6 Joseph H. Harrington  
7 Assistant United States Attorney  
8 Post Office Box 1494  
9 Spokane, WA 99210-1494  
10 Telephone: (509) 353-2767

11 UNITED STATES DISTRICT  
12 FOR THE EASTERN DISTRICT OF WASHINGTON

13 UNITED STATES OF AMERICA,  
14  
15 Plaintiff,

16 vs.

17 JAMES TERRY HENRIKSON, a/k/a,  
18 James Henricksen,  
19 a/k/a: Cole Johnson,  
20 a/k/a: James Vanderbilt;  
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23  
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28

Defendants.

**2:14-CR-124-SMJ-1**  
**INDICTMENT**

Vio: 18 U.S.C. § 1958  
Murder-for-Hire  
(Counts 1-2)

Vio: 18 U.S.C. § 1958  
Conspiracy to Commit  
Murder-for-Hire  
(Counts 3-6)

Vio: 18 U.S.C. § 373  
Solicitation to Commit  
Murder-for-Hire  
(Counts 7-10)

Vio: 21 U.S.C. §§ 841(a)(1), 846  
Conspiracy to Distribute  
Heroin (Count 11)

The Grand Jury charges:

**COUNT 1**

**MURDER FOR HIRE**

**(Murder of Kristopher Clarke)**

That beginning on or about January 15, 2012, and continuing until on or about February 22, 2012, within the Eastern District of Washington and elsewhere, JAMES TERRY HENRIKSON did cause [REDACTED] to travel in interstate commerce from the State of Washington to the State of North Dakota, and did use and cause another to use a facility of interstate commerce, that is a cellular telephone, with an intent that a murder be committed in violation of the laws of any State and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary value, to wit: money, and the murder of Kristopher Clarke was in fact committed, in violation of 18 U.S.C. §§ 1958(a) and 2.

**COUNT 2**

**MURDER FOR HIRE**

**(Murder of Douglas Carlile)**

That beginning on or about October 1, 2013, and continuing until on or about December 15, 2013, within the Eastern District of Washington and elsewhere, JAMES TERRY HENRIKSON, [REDACTED]  
[REDACTED]  
[REDACTED], did use and did cause another to use a facility of interstate commerce, that is a cellular telephone, with an intent that a murder be committed in violation of the laws of any State and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary

1 value, to wit: money, and the murder of Douglas Carlile was in fact committed, in  
2 violation of 18 U.S.C. §§ 1958(a) and 2.

3 **COUNT 3**

4 **CONSPIRACY TO COMMIT MURDER FOR HIRE**

5 **(Murder of Douglas Carlile)**

6 That beginning on or about October 1, 2013, and continuing until on or  
7 about December 15, 2013, within the Eastern District of Washington, and  
8 elsewhere, JAMES TERRY HENRIKSON, [REDACTED]  
9 [REDACTED]

10 [REDACTED]  
11 [REDACTED] did knowingly and intentionally combine, conspire, confederate and  
12 agree together and with each other to use and cause another to use a facility of  
13 interstate commerce, that is a cellular telephone, with an intent that a murder be  
14 committed in violation of the laws of any State and the United States, as  
15 consideration for the receipt of, and as consideration for a promise and agreement  
16 to pay a thing of pecuniary value, to wit: money, and the murder of Douglas Carlile  
17 was in fact committed, in violation of 18 U.S.C. § 1958(a).

18 **COUNT 4**

19 **CONSPIRACY TO COMMIT MURDER FOR HIRE**

20 **(Jay Wright)**

21 That beginning on or about October 1, 2012, and continuing until on or  
22 about December 30, 2012, within the Eastern District of Washington and  
23 elsewhere, JAMES TERRY HENRIKSON, [REDACTED]  
24 [REDACTED]

25 [REDACTED] and others both known and unknown to the Grand Jury,  
26 did knowingly and intentionally combine, conspire, confederate and agree together  
27 and with each other to use and cause another to use a facility of interstate  
28 commerce, that is a cellular telephone, with an intent that a murder be committed  
in violation of the laws of any State and the United States, as consideration for the

1 receipt of, and as consideration for a promise and agreement to pay a thing of  
2 pecuniary value, to wit: money, in violation of 18 U.S.C. § 1958(a).

3 **COUNT 5**

4 **CONSPIRACY TO COMMIT MURDER FOR HIRE**

5 **(Jed McClure)**

6 That beginning between on or about December 1, 2012, and on or about  
7 May 1, 2013, within the Eastern District of Washington and elsewhere, JAMES  
8 TERRY HENRIKSON, [REDACTED]

9 [REDACTED] and others both known and unknown to the Grand Jury, did knowingly  
10 and intentionally combine, conspire, confederate and agree together and with each  
11 other to travel and did cause another to travel in interstate commerce from the State  
12 of Washington to the State of Illinois, and to use and cause another to use a facility  
13 of interstate commerce, that is a cellular telephone, with an intent that a murder be  
14 committed in violation of the laws of any State and the United States, as  
15 consideration for the receipt of, and as consideration for a promise and agreement  
16 to pay a thing of pecuniary value, to wit: money, in violation of 18 U.S.C. §  
17 1958(a).  
18

19 **COUNT 6**

20 **CONSPIRACY TO COMMIT MURDER FOR HIRE**

21 **(Tim Scott)**

22 That beginning on or about January 15, 2013, and continuing until on or  
23 about May 1, 2013, within the Eastern District of Washington and elsewhere,  
24 JAMES TERRY HENRIKSON, [REDACTED]

25 [REDACTED] and others both known and unknown to the Grand Jury, did  
26 knowingly and intentionally combine, conspire, confederate and agree together and  
27 with each other, to use and cause another to use a facility of interstate commerce,  
28 that is a cellular telephone, with an intent that a murder be committed in violation

1 of the laws of any State and the United States, as consideration for the receipt of,  
2 and as consideration for a promise and agreement to pay a thing of pecuniary  
3 value, to wit: money, in violation of 18 U.S.C. § 1958(a).

4 **COUNT 7**

5 **SOLICITATION TO COMMIT THE MURDER-FOR-HIRE**

6 **(Kristopher Clarke)**

7 That beginning on or about February 1, 2012, and continuing until on or  
8 about February 23, 2012, within the Eastern District of Washington and elsewhere,  
9 JAMES TERRY HENRIKSON, with the intent that another person or persons  
10 engage in conduct constituting a felony that has as an element the use, attempted  
11 use, and threatened use of physical force against the person of another in violation  
12 of the laws of the United States, and under circumstances strongly corroborative of  
13 that intent, did solicit, command, induce and otherwise endeavor to persuade  
14 TIMOTHY EUGENE SUCKOW to commit the murder of Kristopher Clarke, in  
15 violation of 18 U.S.C. § 1958, all in violation of 18 U.S.C. § 373.

16 **COUNT 8**

17 **SOLICITATION TO COMMIT THE MURDER-FOR-HIRE**

18 **(Douglas Carlile)**

19 Beginning in and around October 1, 2013 and continuing until on or about  
20 December 15, 2013, within the Eastern District of Washington and elsewhere,  
21 JAMES TERRY HENRIKSON and [REDACTED], with the intent  
22 that another person or persons engage in conduct constituting a felony that has as  
23 an element the use, attempted use, and threatened use of physical force against the  
24 person of another in violation of the laws of the United States, and under  
25 circumstances strongly corroborative of that intent, did solicit, command, induce  
26 and otherwise endeavor to persuade [REDACTED] to commit  
27  
28

1 the murder of Douglas Carlile, in violation of 18 U.S.C. § 1958, all in violation of  
2 18 U.S.C. § 373.

3 **COUNT 9**

4 **SOLICITATION TO COMMIT THE MURDER-FOR-HIRE**

5 **(Tim Scott)**

6 That beginning in and around October 1, 2013 and continuing until on or  
7 about December 15, 2013, within the Eastern District of Washington and  
8 elsewhere, JAMES TERRY HENRIKSON and [REDACTED],  
9 with the intent that another person or persons engage in conduct constituting a  
10 felony that has as an element the use, attempted use, and threatened use of physical  
11 force against the person of another in violation of the laws of the United States,  
12 and under circumstances strongly corroborative of that intent, did solicit,  
13 command, induce and otherwise endeavor to persuade [REDACTED] to  
14 commit the murder of Tim Scott, in violation of 18 U.S.C. § 1958, all in violation  
15 of 18 U.S.C. § 373.  
16

17 **COUNT 10**

18 **SOLICITATION TO COMMIT THE MURDER-FOR-HIRE**

19 **(Jed McClure)**

20 That beginning on or about December 1, 2012 and continuing until on or  
21 about March 1, 2013, within the Eastern District of Washington and elsewhere,  
22 JAMES TERRY HENRIKSON, with the intent that another person or persons  
23 engage in conduct constituting a felony that has as an element the use, attempted  
24 use, and threatened use of physical force against the person of another in violation  
25 of the laws of the United States, and under circumstances strongly corroborative of  
26 that intent, did solicit, command, induce and otherwise endeavor to persuade  
27 [REDACTED], and Marvin Martin, also  
28

1 known as “Wiz” to commit the murder of Jed McClure, in violation of 18 U.S.C. §  
2 1958, all in violation of 18 U.S.C. § 373.

3 **COUNT 11**

4 **CONSPIRACY TO DISTRIBUTE HEROIN**

5 That beginning on or about December 1, 2011, and continuing until on or  
6 about June 1, 2013, within the Eastern District of Washington and elsewhere,  
7 JAMES TERRY HENRIKSON, [REDACTED]  
8 [REDACTED] [REDACTED] unknown to the Grand Jury, did  
9 knowingly and intentionally combine, conspire, confederate and agree together and  
10 with each other, and with other persons, both known and unknown to the Grand  
11 Jury, to commit the following offense against the United States, to wit: distribution  
12 of 100 grams or more of heroin, a Schedule I controlled substance, in violation of  
13 21 U.S.C. § § 841(a)(1),(b)(1)(B)(i), and 846.  
14

15 **NOTICE OF SPECIAL FINDINGS**

16 As to Defendant JAMES TERRY HENRIKSON, and as to Counts 1, 2, and 3:  
17 (1) Was 18 years of age or older at the time of the offense. 18 U.S.C. § 3591(a).  
18 (2) Intentionally did cause another to kill Kristopher Clarke and Douglas Carlile.  
19 18 U.S.C. § 3591(a)(2)(A)  
20 (3) Intentionally did cause another to inflict serious bodily injury that resulted in  
21 the death of the victims. 18 U.S.C. § 3591(a)(2)(B)  
22 (4) Intentionally participated in an act, contemplating that the life of a person  
23 would be taken or intending that lethal force would be used in connection with a  
24 person, other than one of the participants of the offense, and the victim died as a  
25 direct result of the act. 18 U.S.C. § 3591(a)(2)(C).  
26 (5) Intentionally and specifically engaged in an act of violence, knowing that the  
27 act created a grave risk of death to a person, other than one of the participants in  
28

1 the offense, such that participation in the act constituted a reckless disregard for  
2 human life and the victim died as a result of the act. 18 U.S.C. § 3591(a)(2)(D).

3 (6) Intentionally caused another to commit a homicide offense in an especially  
4 heinous, cruel, or depraved manner in that it involved torture or serious physical  
5 abuse to the victim. 18 U.S.C. § 3592(c)(6).

6 (7) Intentionally caused another to commit the homicide offense as consideration  
7 for the receipt, or in the expectation of the receipt, of anything of pecuniary value.  
8 18 U.S.C. § 3592(c)(8).

9 (8) Intentionally caused another to commit the homicide offense after substantial  
10 planning and premeditation to cause the death of a person. 18 U.S.C. § 3592(c)(9).

11  
12  
13 As to the Defendant [REDACTED] and as to Counts 2 and 3:

14 (1) Was 18 years of age or older at the time of the offense. 18 U.S.C. § 3591(a).

15 (2) Intentionally killed Douglas Carlile. 18 U.S.C. § 3591(a)(2)(A)

16 (3) Intentionally inflicted serious bodily injury that resulted in the death of the  
17 victim. 18 U.S.C. § 3591(a)(2)(B)

18 (4) Intentionally participated in an act, contemplating that the life of a person  
19 would be taken or intending that lethal force would be used in connection with a  
20 person, other than one of the participants of the offense, and the victim died as a  
21 direct result of the act. 18 U.S.C. § 3591(a)(2)(C).

22 (5) Intentionally and specifically engaged in an act of violence, knowing that the  
23 act created a grave risk of death to a person, other than one of the participants in  
24 the offense, such that participation in the act constituted a reckless disregard for  
25 human life and the victim died as a result of the act. 18 U.S.C. § 3591(a)(2)(D).

26 (6) Committed the homicide offense in an especially heinous, cruel, or depraved  
27 manner in that it involved torture or serious physical abuse to the victim. 18 U.S.C.  
28 § 3592(c)(6).



1 (7) Committed the homicide offense as consideration for the receipt, or in the  
2 expectation of the receipt, of anything of pecuniary value. 18 U.S.C. § 3592(c)(8).

3 (8) Committed the homicide offense after substantial planning and premeditation  
4 to cause the death of a person. 18 U.S.C. § 3592(c)(9).

5 Pursuant to 18 U.S.C. §§ 3591 and 3592.

6  
7 DATED this \_\_\_\_day of September, 2014.  
8

9  
10 A TRUE BILL

11  
12 \_\_\_\_\_  
Foreperson

13 MICHAEL C. ORMSBY  
14 United States Attorney  
15

16 Aine Ahmed  
17 Assistant United States Attorney  
18

19 Joseph H. Harrington  
20 Assistant United States Attorney  
21